

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Case No. 17-20456

Plaintiff,

Hon. Mathew F. Leitman  
U.S. District Judge

v.

AMOR M. FTOUHI,

Hon. Stephanie Dawkins Davis  
U.S. Magistrate Judge

Defendant.

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**STIPULATION REGARDING THE DEFINITION OF CERTAIN TERMS**

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The United States of America, by Assistant United States Attorney Cathleen Corken and the defendant, Amor M. Ftouhi, by his attorney Joan Morgan, stipulate and agree on the following definitions of terms:

Allah

God, in Arabic.

Allahu akbar

Translates as Allah [God] is greater, or the greatest. More loosely, it means God is great.

Al Qaeda

Al Qaeda is the U.S. and U.N.-designated terrorist group founded and led by Usama bin Laden until his death. The term literally means “The Base.”

Believer

In the context of Jihadist material, the term ‘believer’ typically refers to someone who is Muslim.

Burqa

The Burqa is a one-piece veil covering the face and body, typically including a mesh screen for the eyes.

Eid

A reference to a Muslim holiday, especially Eid al-Fitr, which marks the end of the holy month of Ramadan.

“Go out” = “going out for jihad”

To “go out for jihad” is colloquial jargon for leaving one’s home to go participate in jihad.

Haram

Something that is “Haram” is forbidden under Islamic law

Hijab

The word Hijab is generally about the idea of covering up, but is colloquially used today most frequently to describe headscarves worn by some Muslim women.

Iftar

The Iftar meal is the meal shared by Muslims after sunset to break their fast during the holy month of Ramadan.

Infidel

Infidel, meaning unfaithful, refers to someone who does not believe in religion, or believes in a religion other than one’s own.

## Infidel criminals

In the context of jihad, non-Muslims engaged in activities with which jihadis disagree—especially military conflicts—are sometimes referred to as Infidel criminals.

## ISIS/Daesh

The Islamic State in Iraq and Syria (ISIS) is also known by the Arabic acronym Daesh. It is also sometimes referred to as the Islamic State in Iraq and the Levant (ISIL).

## Islam

Islam is the religion practiced by Muslims.

## Jihad

The term jihad literally translates as “struggle,” and has two meanings – only one of which is violent. The non-violent meaning of jihad refers to the personal struggle for virtue and morality, the striving to follow God’s will. In the context of acts of violence and terrorism, the term jihad refers to the violent struggle against perceived enemies of Islam.

## Laylat al-Qadr (“the Night of Decree” or “Night of Power”)

The twenty-seventh day of Ramadan. In 2017, this day was on June 21, 2017. In Islamic tradition, this is the night when the first verses of the Quran were revealed to the prophet Muhammad. Some Muslims believe that God [Allah] gives special favors on this day for acts performed for God.

## Martyr

Generally, someone who dies or suffers in the name of their

faith.

Master of the mujahidin, Muhammad

The Prophet Muhammad, as the first leader of the Islamic nation (Ummah), could be referred to as the master of the mujahidin.

Mujahidin

Mujahidin refers to people engaged in jihad, it is the plural of the term 'mujahid,' which means one engaged in jihad.

Niqab

The Niqab is a face veil that leaves an open area around the eyes, though it can also include an eye veil. It is typically worn along with a headscarf.

Prophet Muhammad

The Prophet Muhammad was the founder of the Islamic religion. According to Muslim tradition, he received revelation from God (Allah) over a period of some twenty-three years, which collectively became Islam's holy book the Quran.

Ramadan

Ramadan is the ninth month on the Islamic (lunar) calendar. Fasting during the day throughout the month of Ramadan is considered one of the Five Pillars of the Muslim faith, commemorating the revelation of the holy Quran by the prophet Mohammed.

The 9/11 attacks

The September 11, 2001 (9/11) attacks include the al Qaeda

airplane hijacking plots that resulted in the destruction of the World Trade Center towers in New York City, the attack on the Pentagon just outside

Unbeliever

In the context of Jihadist material, the term ‘unbeliever’ typically refers to someone who is not Muslim.

Usama bin Laden

The founder and longtime leader of al Qaeda, bin Laden was killed in a raid by U.S. Navy SEALs in May 2011.

The parties further agree that the jury shall be advised of the above fact without further proofs on the part of the government.

/s/ CATHLEEN CORKEN  
Assistant United States Attorney

/s/ JOAN MORGAN  
Attorney for Amor M. Ftouhi

Dated: October 31, 2018